

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

UNITED STATES OF AMERICA,

And

**LOUISIANA DEPARTMENT OF
ENVIRONMENTAL QUALITY,**

Plaintiffs,

v.

**PACKAGING CORPORATION OF
AMERICA,**

Defendant.

Case No. 2:22-cv-05361-JDC-KK

Judge James D. Cain, Jr.

Magistrate Judge Kathleen Kay

PLAINTIFFS' CONSENT MOTION TO APPROVE STIPULATION OF SETTLEMENT

Plaintiffs, the United States of America ("United States"), on behalf of the United States Environmental Protection Agency ("EPA"), and the Louisiana Department of Environmental Quality ("LDEQ") respectfully move this Court to approve as a final judgment the Stipulation of Settlement ("Stipulation") lodged with the Court on September 28, 2022. *See* Stipulation (ECF Doc. 2-1). Counsel for the United States and LDEQ have conferred with counsel for the Defendant, Packaging Corporation of America. All parties agree that this motion is filed with their consent. A supporting memorandum is filed concurrently with this motion.

WHEREFORE, for the reasons set forth in the supporting memorandum, Plaintiffs respectfully request that the Court grant this motion, approve the Stipulation by **signing page 15**, and enter the Stipulation as a final judgment in this matter.

Dated: December 21, 2022

Respectfully submitted,

FOR THE UNITED STATES OF AMERICA:

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 2022, a true and correct copy of the foregoing PLAINTIFFS' CONSENT MOTION TO APPROVE STIPULATION OF SETTLEMENT, attached MEMORANDUM IN SUPPORT, attached EXHIBIT A, and attached PROPOSED ORDER were filed with the Clerk of the U.S. District Court for the Western District of Louisiana using the Court's CM/ECF system. Notice of this Electronic Filing will be sent to all parties by operation of the Court's Electronic Filing System.

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